

Exhibit B

Email and Text Notices

Email Notice:

Subject: Notice of Lawsuit on Behalf of New York GEICO Special Investigators

Body:

Important: You are NOT being sued. This Notice is NOT a solicitation from a lawyer. The Court authorized this Notice.

If you live or lived in New York and work or have worked as a Special Investigator for Government Employees Insurance Company (“GEICO”) at any time since October 23, 2020, you may be eligible to participate in a collective action lawsuit that may affect your legal rights. Plaintiffs are current and former Special Investigators who brought this lawsuit on behalf of themselves and all current and former Special Investigators employed by GEICO after October 23, 2020. Plaintiffs claim that GEICO did not pay Special Investigators overtime wages owed to them. GEICO denies any wrongdoing and maintains that it paid Special Investigators in compliance with all applicable overtime laws.

The notice and its contents have been authorized by the United States District Court for the Eastern District of New York. The Court has taken no position in this case about the merits of the parties’ claims and defenses.

Unless you complete and return the Consent to Join form by emailing the form to [administrator email] or mailing to the administrator postmarked by [60 days after initial mailing], you will not be able to participate in this lawsuit or, if successful, share in any monetary recovery obtained in this case.

[Case Administrator]
[Street Address]
[City, State, Zip Code]
[Phone Number]

Plaintiffs are represented by Outten & Golden LLP and Kessler Matura P.C. If you have any questions, you can contact Plaintiffs’ counsel at [GEICO-SIU@outtengolden.com].

Text Notice:

Notice of Lawsuit: If you were a GEICO Special Investigator living in New York and working for GEICO between October 23, 2020 and the present, you may be eligible to join a collective action lawsuit. This message was authorized by a court and was sent on behalf of Outten & Golden LLP and Kessler Matura P.C., the law firms representing Plaintiffs. If you have any questions, you can contact Plaintiffs’ counsel at [GEICO-SIU@outtengolden.com].